

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BOSCAINO COLLISION & TOWING
CORP., individually and on behalf of itself
and other similarly situated collision repair
shops and towing companies located in the
City of New York,

Plaintiff,

v.

RUDOLPH J. MEOLA, LAW OFFICE OF
RUDOLPH J. MEOLA, and MEOLA LAW
FIRM,

Defendants.

CIVIL CASE NO: 23-cv-7510

**NOTICE OF MOTION FOR SANCTIONS
PURSUANT TO 28 U.S.C. § 1927 AND
THE COURT'S INHERENT
AUTHORITY**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1927 and the Court's inherent authority, Defendant Rudolph J. Meola d/b/a the Law Office of Rudolph J. Meola d/b/a the Meola Law Firm ("Mr. Meola") will move this Court, on a date and time to be set by the Court, for an order entering sanctions against Plaintiff Boscaino Collision & Towing Corp. ("Boscaino") and its attorney, Gary Rosen, Esq., and awarding such other and further relief as the Court deems just and proper, before the Honorable Judge Frederic Block at the United States District Court for the Eastern District of New York, 225 Cadman Plaza E, Brooklyn, NY 11201.

Mr. Meola shall rely on the accompanying Memorandum of Law, the Declaration of Mr. Meola, with exhibits appended thereto and, the Declaration of Nicholas A. Duston, Esq., with exhibits appended thereto to support his motion.

Dated: November 20, 2023

NORRIS MCLAUGHLIN P.A.

Attorneys for Defendant

By: /s/ Nicholas Duston

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